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3. Mr. Ingram only alleged a claim of “comparator” age discrimination. But he cannot prove such a claim circumstantially because there is no evidence that GSI replaced Ingram with a younger worker.

4. In support of this Motion, GSI attaches and incorporates the following exhibits:

- a. **Exhibit “A”** – Charge of Discrimination;
- b. **Exhibit “B”** – Excerpts from Deposition of Jason Peacock;
- c. **Exhibit “C”** – Excerpts from Deposition of Eddie Ingram;
- d. **Exhibit “D”** – Excerpts from Deposition of Meredith Allred;
- e. **Exhibit “E”** – Sworn Petition to Approve Workers’ Compensation Settlement;
- f. **Exhibit “F”** – Excerpts from GSI Responses to Interrogatories;
- f. **Exhibit “G”** – Order Approving Workers’ Compensation Settlement.

5. GSI is concurrently filing a memorandum of authorities supporting this motion, in accord with the provisions of L.U. Civ. R. 7(b)(4).

WHEREFORE, PREMISES CONSIDERED the Defendant GSI Services, LLC d/b/a Emerald Transformer, requests that the Court enter summary judgment in its favor, dismissing all claims against it with prejudice. Alternatively, GSI requests any relief that would be proper in the circumstances.

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Dated: May 9, 2018.

Respectfully submitted,

**GSI SERVICES LLC d/b/a EMERALD
TRANSFORMER**

By: s/ H. Richard Davis, Jr.
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CERTIFICATE OF SERVICE

I, H. Richard Davis, one of the attorneys for the Defendant, do hereby certify that I have, this day, filed the foregoing with the Clerk of Court via the CM/ECF system, which has caused a true and correct copy to be served on all counsel of record.

Dated: May 9, 2018.

s/H. Richard Davis, Jr.
H. Richard Davis, Jr.